

Exhibit E

From: [Patrick Trainor, Esq.](#)
To: [Starbuck, Emily](#)
Cc: [Mulherin, Joseph](#)
Subject: RE: D"Ambly - Electronic discovery parameters
Date: Saturday, December 10, 2022 10:30:45 AM
Attachments: [REVISED D"Ambly - FIRST SET OF Electronic Discovery SEARCH Parameters - 12.09.22.xlsx](#)

[External Email]

Good morning. I added some terms to your list and bumped back the start date by two months. Other than all persons, who would possess information concerning employment/terminations, I have no idea who the custodians would be, so I deleted those names. Also, the list of custodians was far from complete, because I am sure people like Ms. Nechtaval have support staff and those support staff are clearly people that possess information concerning D'Ambly's termination and your client's contact with Exoo, but they have not been disclosed.

Moreover, as we agreed in our conference call, this is the first search.

Sincerely,

Patrick Trainor, Esq.

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Plaintiff's First Electronic Discovery Search Parameters
Time Period August 1, 2018 to September 30, 2019

Search Terms
"Christian Exoo"
Antifashgordon
@Antifashgordon
Exoo
Christian Exoo
"Chris Exoo"
"Daniel D'Ambly"
"Dan D'Ambly"
D'Ambly
"Daniel Dambly"
Dan Dambly
Dambly
"New Jersey European Heritage Association"
NJEHA
Doxed OR Doxing OR Dox
Nazi
Fascist
Facist
Racist
"White Supremacists"
"White supremacist"
working
employ
Teamsters
@Teamsters
"Jersey Goyz 14"

Plaintiff's First Electronic Discovery Search Parameters
Time Period August 1, 2018 to September 30, 2019

Search Terms
"Jersey Goyz"
employing
holocaust
@slpng_giants
printer
"Jersey City"
Teamsters
Nazis
hate
"hate group"
"Titus D'Andrea"
Dayton
@NYDailyNews
212-210-2100
"print shop"
201-356-6923
201.356.6923
(201) 946-6000
"printing facilities"
"bootlicking nazi"
"white nationalist"
@dlamontjenkins
"Daryle Lamont Jenkins"
"that scab"
"anti racist history"
"neo nazis"

Plaintiff's First Electronic Discovery Search Parameters
Time Period August 1, 2018 to September 30, 2019

Search Terms
"neo-nazis"
"neo nazi"
"neo-nazi"
"judd legum"
"kill Jewish people"
@nycantifa
"Make Dan's Face into a Tomato Again"
"holocaust denying Nazi"
"Kit O'Connell"
"European heritage"
@shaunking
"Martha Friend"
@fivesibs3
"contact the @NYDailyNews"
"they kick puppies."
"Fire neo-Nazi"
"Dan D'Ambly of @NYDailyNews"
Daryl Lamont Jenkins
Oren Segal
"Oren Segal
ADL
"anti defamation league"
"anti-defamation league"
Mark Pitcavage
"Mark Pitcavage"
SPLC

Plaintiff's First Electronic Discovery Search Parameters
Time Period August 1, 2018 to September 30, 2019

Search Terms
"Southern Poverty Law Center"
"Nick Penniman"
"Andy Campbell"
"Huffington Post"
"Huffpo"
"any violence or blood spilled"
@ADL_National
@splcenter